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Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY INTERNATIONAL

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

| | | |
|--|---|-------------------------------|
| In re |) | Case No. 95 10911 aj |
| |) | Chapter 7 |
| GERALD ARMSTRONG, |) | |
| |) | Adv. Pro. No. 95 1164 |
| Debtor. |) | |
| <hr/> | | |
| |) | Trial Date: February 13, 1996 |
| CHURCH OF SCIENTOLOGY |) | |
| INTERNATIONAL, a California non-profit |) | |
| religious corporation, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| GERALD ARMSTRONG, |) | |
| |) | |
| Defendant. |) | |
| <hr/> | | |

PLAINTIFF CHURCH OF SCIENTOLOGY INTERNATIONAL'S MOTION
IN LIMINE TO EXCLUDE SPECIFIED EVIDENCE

I.

INTRODUCTION

Plaintiff Church of Scientology International (the "Church") hereby moves this Court for an Order excluding the evidence specified in Appendices A and B hereto.

The factual and legal issues presented by the instant adversary proceeding generally concern three narrow and specific questions:

1) Whether Defendant Gerald Armstrong ("Armstrong") made such false oaths in connection with his bankruptcy filing so as to render Armstrong's debts nondischargeable pursuant to section 727(a)(4)(A) of the United States Bankruptcy Code (the "Code").

2) Whether Armstrong failed to satisfactorily explain his loss of and/or deficiency of assets so as to render Armstrong's debts nondischargeable pursuant to section 727(a)(5) of the Code.

3) Whether the permanent injunction entered against Armstrong by the Los Angeles Superior Court in the case of Church of Scientology International v. Gerald Armstrong, Marin County Superior Court, Case No. 157 680 (the "Injunction"), is a claim which can be discharged by Armstrong's bankruptcy filing.

The evidence necessary to resolve these issues is quite limited. Evidence relating to the first issue concerns Armstrong's financial status and whether such status was adequately disclosed. Evidence relating to the second issue concerns Armstrong's dissipation of assets and his failure to explain that dissipation. The third issue is solely legal.

Nonetheless, Armstrong's proposed evidence -- the declarations and exhibits received on February 7 and 8 -- are almost entirely objectionable as irrelevant, highly prejudicial, and/or hearsay. This evidence would also cause prejudice against the Church, confuse the issues and unduly waste time.

1 Examples of the irrelevant (and inflammatory) material proffered by Armstrong are
2 found throughout Armstrong's trial declarations. For instance, Armstrong attacks the Founder
3 of the Church's religion with chains of invective. His target, L. Ron Hubbard, died in 1986.
4 Gerald Armstrong's Trial Declaration ("Armstrong's Declaration") No. 3, 15:26-16:3.
5 Armstrong further attacks the Church's religion as a "contumelious cult." Armstrong's
6 Declaration No. 4, 16:17-23. Armstrong then seeks to accredit his testimony by claiming to
7 act on behalf of God, having been "chosen to oppose" the Church. Armstrong's Declaration
8 No. 5, 24:25-27. This is a bankruptcy proceeding. All such evidence is irrelevant and
9 designed to engender prejudice. All such evidence should be excluded from trial. Needless to
10 say, these assertions are false, and can easily be disproved. To do so, however, would
11 consume an enormous amount of the Court's time.

12
13
14 The quantity of proffered evidence is so great that it is almost impossible to specifically
15 argue the inadmissibility of such evidence in a fashion that the Court could be expected to
16 "wade through" it all. Thus, the approach here is to explain why certain categories of
17 evidence submitted by Armstrong should be excluded, along with attached Appendices which
18 detail the specific evidence that fits within such categories.

19
20 **A. All Evidence Pertaining To The Prior "Bad Acts" Armstrong Alleges To Have**
21 **Been Committed By The Church Or Any Person Affiliated With The Church**
Should Be Excluded.

22 **1. All Evidence Pertaining To The Prior "Bad Acts" Armstrong Alleges To**
23 **Have Been Committed By Plaintiff Is Irrelevant And Should Thus Be**
Excluded Under Evidence Code 401.

24 Armstrong has submitted six declarations for use at trial, most of which are accounts of
25 alleged prior "bad acts" of the Church and persons affiliated with the Church. All such
26 evidence is irrelevant and should be excluded.

27
28 Here, the prior "bad acts," and other character evidence submitted by Armstrong, has

1 no tendency to prove or disprove the existence of any fact of consequence, and is hence not
2 relevant within the meaning of Federal Rules of Evidence 401.

3 Such evidence is not made relevant by Armstrong's inclusion of certain equitable
4 defenses in Armstrong's Answer, such as those of "unclean hands" and "in pari delicto." For
5 these equitable doctrines to apply, the alleged misconduct "'must pertain to the very subject
6 matter involved . . . [and] must infect the cause of action before the court.'" Washington
7 Capitols Basketball Club, Inc. v. Barry, 419 F.2d 472 (9th Cir. 1969) (quoting Fibreboard
8 Paper Prod. Corp. v. East Bay Union, 227 Cal.App.2d 675 (1964)).

9
10 Here, there is no indication of any misconduct by the Church that could be deemed to
11 "infect" the false oaths made by Armstrong in connection with his bankruptcy filing, or the
12 dischargeability of the Injunction.

13
14 **2. All Evidence Pertaining To The Prior "Bad Acts" Armstrong Alleges To**
15 **Have Been Committed By the Church Or Any Person Affiliated With the**
16 **Church Should Be Excluded Pursuant To Federal Rule Of Evidence 403.**

17 Even if these "bad acts," were marginally relevant, the evidence should be excluded
18 pursuant to Federal Rule of Evidence 403 because its "... probative value is substantially
19 outweighed by the danger of unfair prejudice, confusion of the issues, . . . or by
20 considerations of undue delay, waste of time, or needless presentation of cumulative
21 evidence." Fed. Rule Evid. 403. Armstrong's evidence consists primarily of scurrilous
22 expressions of religious bigotry against the Scientology faith and its members. This takes the
23 form of allegations of alleged prior "bad acts" by the Church or affiliated persons. See, e.g.
24 Gerald Armstrong's Trial Declaration p.5:21-6:1. Appendix A hereto sets forth the numerous
25 incidents that inflammatory material as to alleged "bad acts" by the Church is stated in
26
27
28

1 Armstrong's Trial Declaration Number 1.¹

2 Armstrong's account of alleged prior "bad acts" by the Church, and persons affiliated
3 with the Church, is far too remote to the issues presented in this action to subject the Church
4 to the clear danger of prejudice and the confusion of the issues which will arise if it is
5 admitted. The Court should not allow Armstrong to obfuscate the narrow inquiry into whether
6 Armstrong made false oaths in connection with this bankruptcy filing and whether the
7 Injunction is a dischargeable claim.
8

9 Further, given the clear prejudice against the Church that the subject material is
10 calculated to cause, the Church can, of course, disprove Armstrong's charges, at great time
11 and expense to the Court and to itself. This is exactly the type of situation Rule 403 was
12 enacted to avoid. The Court should prevent such a lengthy excursion into such facts of no
13 consequence to this litigation by excluding all this evidence. See Appendix A.
14

15 **B. All Evidence Pertaining To The History Of Armstrong's Experiences With The**
16 **Church Or Any Person Affiliated With The Church Should Be Excluded.**

17 The above argument regarding the evidence of alleged prior "bad acts" applies equally
18 to the evidence submitted by Armstrong which describes the history of Armstrong's
19 experiences with the Scientology faith. In fact, as set forth in Appendices A and B hereto,
20 there is significant "overlap" between these two categories of evidence in Armstrong's trial
21 declarations and exhibits.
22
23
24

25 ¹ The remaining "trial declarations" are equally objectionable on a paragraph by paragraph
26 basis, but should be excluded in their entirety because they were all previously submitted by
27 Armstrong as evidence to the state court in the summary judgment proceedings which resulted in
28 a final judgment in the Church's favor. See, Plaintiff Church of Scientology International's
Motion In Limine to Exclude Evidence Pertaining to Issues Already Decided in State Court
Proceedings.

1 Armstrong's trial declarations and exhibits contain an irrelevant, and almost wholly
2 false account of Armstrong's life and experiences as a member of the Scientology religion,
3 dating back to 1969. Armstrong's "history" evidence tracks Armstrong's alleged experiences
4 working with various offices and individuals affiliated with the Scientology faith. The
5 proffered "history" evidence is calculated to cause prejudice against the Church and has
6 absolutely no bearing on the question of whether Armstrong made false oaths and accounts in
7 connection with his bankruptcy filing, or whether the Injunction is a dischargeable claim. All
8 such evidence should, therefore, be excluded pursuant to Federal Rules of Evidence 402 and
9 403.
10

11 **C. All Hearsay Evidence Not Properly Within Any Exception To The Hearsay Rule**
12 **Should Be Excluded.**

13 Federal Rule of Evidence 801 defines "hearsay" as follows:

14 "Hearsay" is a statement other than one made by the declarant while testifying
15 at the trial or hearing, offered in evidence to prove the truth of the matter
16 asserted.

17 Armstrong's declarations contain extensive hearsay statements that do not fit into any
18 recognized exception to the rule excluding hearsay.

19 Pursuant to the Court's Order regarding trial testimony, the majority of testimony
20 presented at trial will be in the form of declarations. However, the statements in those
21 declarations must be based on such declarant's personal perceptions. Statements which
22 reiterate the statements and perceptions of others are inadmissible hearsay. Appendix A hereto
23 identifies the specific portions of Armstrong's declaration in which the latter type of hearsay
24 evidence is proffered that does not fit within any exception to the hearsay rule. All such
25 hearsay evidence should be excluded.
26

27 ///

1 **D. All Evidence Of Scientology Beliefs, Practices And Internal Governance Should Be**
2 **Excluded Under Rule 610.**

3 Federal Rule of Evidence 610 prohibits the admission of evidence pertaining the
4 religious beliefs and practices of witnesses that is calculated to impact the credibility of such
5 witnesses.

6 The Court here has no need to evaluate the religious bona fides of Scientology; the
7 only possible purpose of the evidence proffered would be to impassion and prejudice the Court
8 against those who Armstrong considers to have "evil" religious beliefs.

9 A representative sample of Armstrong's attacks on Scientology is found where
10 Armstrong states:

12 Scientology will not acknowledge that God, the True Heart, Peace, Mercy and
13 Love, works in people's lives. . . . God in this litigation is pointing out gently
14 that He is in charge, and that satan is a bad belief in which faith should not be
put because faith in satan is always betrayed.

15 Gerald Armstrong's Trial Declaration, p.21:11-17. Appendix A hereto sets forth the
16 numerous instances where Armstrong's trial declarations proffer evidence, like that above,
17 which attacks the Church's faith. The Court should not allow itself to become a "soapbox"
18 for the expression of Armstrong's religious bigotry.

19 A trier of fact, of course, may not directly evaluate the truth or falsity of religious
20 beliefs. U.S. v. Ballard, 322 U.S. 78, 86-87, 64 S.Ct. 882, 886 (1944). Equally as
21 important, a litigant may not attempt to prejudice a trier of fact against a party or a witness by
22 casting particular religious beliefs or practices in a negative light, even if the trier of fact is
23 not asked directly to evaluate the truth or falsity of that belief. This concern is particularly
24 acute when a newer religion is involved. "Delicacy in probing and sensitivity in permissible
25 diversity is required, lest established creeds and dogmas be given an advantage over new and
26 changing modes of religious belief." Stevens v. Berger, 428 F.Supp. 896, 900 (E.D.N.Y.

1 1977); see, Bradesku v. Antion, 21 Ohio App.2d 67, 255 N.E.2d 265, 270 (1969) (evidence
2 "ridiculing a religious practice substantially different from the prevailing culture of this
3 community...tended to excite emotions" and is inadmissible); O'Neil v. Schuckardt, 112 Idaho
4 472, 733 P.2d 693, 703 (1986) (Donaldson, C.J., dissenting) (jury improperly motivated by
5 evidence denigrating religion as a "cult").
6

7 Federal Rule of Evidence 610 provides that:

8 Evidence of the beliefs or opinions of a witness on matters of religion is not
9 admissible for the purpose of showing that by reason of their nature, the
witness' credibility is impaired or enhanced.

10 Despite Federal Rule of Evidence 610, Armstrong has submitted extensive evidence attempting
11 to discredit the Church's witnesses based on their affiliation with the Scientology religion.
12 Armstrong further attempts to accredit himself by claiming he is a Christian and acts on behalf
13 of God. All of such improper evidence should be excluded.
14

15 In United States v. Sampol, 636 F.2d 621 (D.C. Cir. 1980), the defendant sought to
16 impeach a government witness by questioning him concerning his religious beliefs, which the
17 defendant attempted to cast as "unusual." The Court held that the trial court had correctly
18 excluded such evidence under Federal Rule of Evidence 610. In so holding, the court noted
19 that:
20

21 The government correctly points out that the court's
22 exclusion of this evidence was not only justified but required by
23 the Federal Rules of Evidence. Rule 610 bars the admission of
24 evidence of the religious beliefs of a witness for the purpose of
25 showing that his credibility is impaired as a result of those
26 beliefs. The purpose of the rule is to guard against the prejudice
27 which may result from disclosure of a witness' faith. The scope
28 of the prohibition includes the unconventional or unusual
religions. See Government of Virgin Islands v. Peterson, 553
F.2d 324 (3rd Cir. 1977) (defense counsel could not elicit
testimony that alibi witness was a member of the Rastafarian
sect). The fact that Canete professed adherence to a religion

1 which is not commonly shared does not prevent the application of
2 the rule.

3 Id. at 666.

4 The personal religious beliefs and practices of persons affiliated with the Church are
5 not relevant to any issue in this case, and the admission of any evidence as to this would be
6 wholly improper. Nonetheless, Armstrong's trial declarations and exhibits are nearly entirely
7 an attack against the faith practiced by persons affiliated with Armstrong, in the attempt to
8 discredit the testimony of the Church's witnesses.

9
10 On the other extreme, Armstrong's trial declarations are replete with statements
11 whereby Armstrong seeks to credit himself as being guided by Christianity. Armstrong
12 attempts to accredit himself by claiming he is "the defender of [his] Church, designated by
13 God." Armstrong's Trial Declaration, p.22:11-13. The Appendices hereto set forth the
14 numerous instances where Armstrong proffers evidence of religious beliefs, practices and the
15 internal governance of religious organizations, in the effort to discredit the Church or accredit
16 himself. All such evidence should be excluded.

18 II.

19 CONCLUSION

20 In view of the foregoing, all evidence identified in Appendices A and B hereto should
21 be excluded pursuant to Federal Rules of Evidence 401 through 403, inclusive, and Federal
22 Rule of Evidence 610. All such evidence is irrelevant and even if such evidence had some

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27 ///

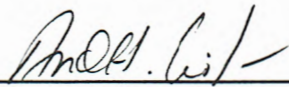
1 relevance, it would be overwhelmingly outweighed by its prejudicial effect, its tendency to
2 confuse the issues and waste time.

3 Dated: February 13, 1996

Respectfully submitted,

WILSON, RYAN AND CAMPILONGO

By:



Andrew H. Wilson
Shauna T. Rajkowski

Laurie J. Bartilson
MOXON & BARTILSON

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

**OBJECTIONS TO
GERALD ARMSTRONG'S TRIAL DECLARATION
February 6, 1996**

| <u>PARAGRAPHS</u> | <u>OBJECTIONS</u> |
|--|--|
| 3, 7, 23, 43, 48, 49 | Irrelevant; confuses the issues; inflammatory and prejudicial. |
| 4, 5, 8, 15 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical. |
| 6, 19, 20, 22, 25, 26, 36, 41, 42, 45 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical; alleged prior bad acts; hearsay. |
| 9, 10, 11, 17, 30 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical; religious beliefs and practices. |
| 13, 14, | Irrelevant; confuses the issues; inflammatory and prejudicial; historical, religious beliefs and practices; hearsay. |
| 12, 23, 24, 31, 33 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical; alleged prior bad acts; religious beliefs and practices. |
| 16, 18, 29 40, 47 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical; alleged prior bad acts. |
| 21, 34 | Irrelevant; confuses the issues; inflammatory and prejudicial; historical; alleged prior bad acts; religious beliefs and practices; hearsay. |
| 27, 32, 44 | Irrelevant; confuses the issue; inflammatory and prejudicial; hearsay. |

APPENDIX B
(Armstrong's Unnumbered Exhibits)

TITLE

DESCRIPTION

Memo excerpt entitled Church of Scientology v. Gerald Armstrong

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.
Affidavit Of Sheila MacDonald Chaleff filed in

Church Of Scientology v. Russell Miller & Penguin Books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Fifth Affidavit of Kenneth David Long - 10-8-87 filed in Church of Scientology v. Russell Miller & Penguin books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Fourth Affidavit of Kenneth David Long - 10-7-87 filed in Church of Scientology v. Russell Miller & Penguin Books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Third Affidavit of Kenneth David Long - 10-5-87 filed in Church of Scientology v. Russell Miller & Penguin Books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Second Affidavit of Kenneth David Long - 10-5-87 filed in Church of Scientology v. Russell Miller & Penguin Books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

First Affidavit of Kenneth David Long - 10-5-87 Church of Scientology v. Russell Miller & Penguin Books Limited

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Hubbard Communication Office Bulletin of 11 May AD13 - "Routine 3, Heaven"

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices.

TITLE

DESCRIPTION

Hubbard Communication Office
Bulletin 1 Oct 1969 - "Why Thetans
Mock Up"

OBJECTION: Confidential; irrelevant; undue
consumption of time; confuses the issues;
inflammatory and prejudicial; religious beliefs and
practices; alleged prior bad acts.

Factnet Newsletter - Perversions,
Criminality & Lies

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; religious beliefs and practices; alleged
prior bad acts.

Declaration of Garry Scarff - 11 Feb
1993

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; religious beliefs and practices; hearsay;
alleged prior bad acts.

Factnet Newsletter - "Still Off the
Rails"

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; religious beliefs and practices; alleged
prior bad acts.

Letter from Michael Rinder to
Charles Collier-Wright - May 9,
1994

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; alleged prior bad acts.

Memo re Gerald Armstrong

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; alleged prior bad acts;
inflammatory and prejudicial; religious beliefs and
practices; alleged prior bad acts.

False Report Correction
Gerald Armstrong

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; religious beliefs and practices; alleged
prior bad acts.

Memo of August 4, 1991 re. Gerald
Armstrong

OBJECTION: Irrelevant; undue consumption of
time; confuses the issues; inflammatory and
prejudicial; alleged prior bad acts.

TITLE

DESCRIPTION

False Report Correction
Breckenridge

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices; alleged prior bad acts.

Declaration of David Miscavige -
February 8, 1994

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Premiere Magazine - September
1993

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices; alleged prior bad acts; hearsay.

Letter from Heber Jentzsch to
Entertainment Television, 5 Aug
1993 re Armstrong

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Transcript - Dec. 23, 1991; CSC v.
Armstrong

OBJECTION: Irrelevant; undue consumption of time; confuses the issues.

Declaration of Kenneth D. Long -
January 19, 1995

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts.

HCO Bulletin of 23 Sept 1968,
"Confidential Restive Cases Former
Therapy"

OBJECTION: Confidential; irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices.

Minute Order 29 Jul 94 by Judge
Diane Wayne re OSC for contempt

OBJECTION: Irrelevant; undue consumption of time; confuses the issues.

Handwritten declaration of Gerald
Armstrong - 19 Jul 91

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Excerpt from book, What is
Scientology? - "The Creed of
Scientology"

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices.

| <u>TITLE</u> | <u>DESCRIPTION</u> |
|--|---|
| Declaration of Michael Rinder - 27 October 1994 | OBJECTION: Irrelevant; undue consumption of time; confuses the issues. |
| Excerpt from Dianetics and Scientology Technical Dictionary | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices. |
| LEVEL 0 CHECKSHEET | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial. |
| HCO PL 11 May 1971 BLACK PR | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial. |
| HCO PL 21 October 1968 CANCELLATION OF FAIR GAME | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial. |
| HCO PL 18 October 1967 PENALTIES FOR LOWER CONDITIONS | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices |
| OSA INT ED 19 SQUIRRELS | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts; religious beliefs and practices. |
| FLAG ED 2820RB SUPPRESSIVE PERSONS AND SUPPRESSIVE GROUPS LIST | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts; religious beliefs and practices. |
| FLAG CONDITIONS ORDER 6665R SUPPRESSIVE PERSON DECLARE GERRY ARMSTRONG | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; religious beliefs and practices. |
| Declaration of Nancy Rodes | OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices. |

TITLE

DESCRIPTION

Declaration of Laurie J. Bartilson in Support of Application for Order to Show Cause Why Gerald Armstrong Should Not Be Held In Contempt

OBJECTION: Irrelevant; undue consumption of time; confuses the issues.

Letter to Republican National Committee, October 23, 1992

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices.

Letter to Ambassador to U.N., Thomas R. Pickering, November 7, 1990

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices.

Letter to Jonathan Marshall, The Tribune, October 14, 1989

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices.

Letter to Jonathan Marshall, The Tribune, 7-28-87

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices.

COMMON GROUND

Advertisements

OBJECTION: Irrelevant

HCO PL 15 August 1960 DEPT OF GOVT AFFAIRS

OBJECTION: Irrelevant; undue consumption of time; confuses the issues.

Letter from Office of the L.A. District Attorney to Rev. Ken Hoden, et al. April 25, 1986

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Public Announcement by Daryl F. Gates, April 23, 1985

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Letter of Authorization from Officer Phillip Rodriguez to Eugene M. Ingram

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

TITLE

DESCRIPTION

HCO PL 25 February 1966
ATTACKS ON SCIENTOLOGY

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; religious beliefs and practices; inflammatory and prejudicial.

DECLARATION OF GERALD
ARMSTRONG, 18 November 1986

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; religious beliefs and practices; inflammatory and prejudicial.

Letter from IRS to Church of
Spiritual Technology, July 8, 1988

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; religious beliefs and practices; inflammatory and prejudicial.

Transcript of Armstrong's side of a
phone called (with Larry Heller)

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial.

Notes re. phone call from Larry
Heller, 11-20-89

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts; inflammatory and prejudicial; hearsay.

Armstrong's notes of conversation
with Larry Heller dated 10/25/89

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial.

Armstrong notes of 10/23/89 re
Larry Heller

OBJECTION: Irrelevant; undue consumption of time; confuses the issues.

Declaration of Gerald Armstrong -
March 26, 1990

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts.

Declaration of Lawrence Heller
dated March 27, 1989

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts.

Letter from Armstrong to Nancy
O'Meara dated February 1, 1989

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial.

TITLE

DESCRIPTION

Letter to Bartilson from Armstrong dated 5/3/93

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Declaration of G. Armstrong dated 2/2/93

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts; religious beliefs and practices.

Declaration of G. Armstrong dated 2/20/94, "Find a Better Basket"

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Pacific Sun letters to the editor entitled "Alleged gagee," and "Another sniveler"

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Pacific Sun article, "Gagged again" dated June 29, 1994

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Letter dated 5/19/94 to C. Collier-Wright, From G. Armstrong

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Letter dated 10/11/93 to Premier Magazine: Response To Richardson Scientology Article

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Letter dated 4/28/93 to G. Armstrong, From L. Bartilson re (KFAV)

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; alleged prior bad acts.

Declaration of G. Armstrong, dated April 21, 1994

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts.

Declaration of G. Armstrong re Motion for Costs, dated April 4, 1994

OBJECTION: Irrelevant; undue consumption of time; confuses the issues; inflammatory and prejudicial; alleged prior bad acts; religious beliefs and practices.

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Directory B:*.*

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| LMF-1123.LTR | 1,797 | 01-24-95 10:53a | LMF-1124.LTR | 1,797 | 01-24-95 10:53a |
| LMF-1159.LTR | 11,887 | 02-23-95 02:51p | | | |